

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

In Re: Sarah Falkson : Case No. 16-13916
:
Debtor : Chapter 13

Hearing to be held
April 18, 2017 at 9:30 a.m. in
U.S. Bankruptcy Court
400 Washington St., 3rd floor,
The Madison Bldg., Reading, PA 19601

MOTION FOR MODIFICATION OF DEBTORS' PLAN POST-CONFIRMATION

NOW COMES the Movant, Sarah Falkson, by and through her attorney, John A. DiGiamberardino, Esquire, and moves this Court to permit her to modify their Plan as provided in Exhibit "A", attached hereto and incorporated herein, and in support thereof, avers the following:

1. This matter was commenced on or about June 1, 2016, when the Debtor filed a Chapter 13 Bankruptcy to the above-captioned term and number.
2. The Debtors' Plan, attached hereto and incorporated herein as Exhibit "B", was confirmed by this Court on or about December 22, 2016 and required the Debtor to pay monthly payments of \$175.00 for 60 months.
3. The proposed Plan filed by the Debtor would provide surrender of the Debtor's Mercury Mariner to the lien holder Laurel Auto Reconditioning as the Debtor has experienced significant mechanical problems with the Mariner that interfere with the normal operation of the vehicle.
4. Debtor requires a normal functioning vehicle to enable her to get back and forth to work and the Debtor has found a replacement vehicle in better condition with a monthly cost substantially the same as the monthly expense for the Mercury Mariner.
5. Other than the surrender of the Mercury Mariner to Laurel Auto Reconditioning (Ed's Auto), Debtor proposes no changes to the distribution of the Plan proceeds.

6. The modified Plan, as attached hereto as Exhibit “A” meets all requirements for Chapter 13 Plan confirmation as provided in 11 U.S.C. 1329, et seq.

WHEREFORE, the Debtor requests your Honorable Court to permit her to modify her Plan post-confirmation.

Respectfully submitted:

CASE & DIGIAMBERARDINO, P.C.

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